



STATE OF NEW YORK  
OFFICE OF THE ATTORNEY GENERAL

LETITIA JAMES  
ATTORNEY GENERAL

DIVISION OF STATE COUNSEL  
LITIGATION BUREAU

Writer's Direct Dial: (212) 416-8673

May 20, 2024

**VIA ECF**

Hon. Kenneth M. Karas  
United States District Judge  
United States Courthouse  
300 Quarropas Street  
White Plains, New York 10601-4150

Re: Lane, et al., v. James, et al., 22 Civ. 10989 (KMK)

Dear Judge Karas:

This Office represents Defendant Superintendent Steven G. James. On May 15, 2024, Defendant James filed his Motion for Summary Judgment. (Dkt. No. 78). After filing, one of Defendant's expert witnesses, Professor Louis Klarevas, identified a typographical error in his Declaration. (Dkt. No. 87). Specifically, Footnote 19 to Prof. Klarevas's Declaration cites to Section IIIA4 of the American Association for Public Opinion Research Code of Professional Ethics and Practices. It should cite instead to Sections IA2 and IA4. Should Plaintiffs or the Court request it, a corrected declaration can be provided to replace the original.

This Office thanks the Court for its attention to this matter.

Respectfully submitted,

/s/ Suzanna Publicker Mettham  
Suzanna Publicker Mettham  
Assistant Attorney General  
[Suzanna.Mettham@ag.ny.gov](mailto:Suzanna.Mettham@ag.ny.gov)

cc: Counsel for all Parties via ECF